

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_  
Jane Doe,

Plaintiff,

v.

SEAN COMBS, DADDY’S HOUSE  
RECORDINGS INC., CE OPCO, LLC d/b/a  
COMBS GLOBAL f/k/a COMBS ENTERPRISES  
LLC, BAD BOY ENTERTAINMENT  
HOLDINGS, INC., BAD BOY PRODUCTIONS  
HOLDINGS, INC., BAD BOY BOOKS  
HOLDINGS, INC., BAD BOY RECORDS LLC,  
BAD BOY ENTERTAINMENT LLC, BAD BOY  
PRODUCTIONS LLC, ORGANIZATIONAL  
DOES 1-10, INDIVIDUAL DOES 1-10, AND  
SHAWN CARTER

Defendants.

24-cv-07975-AT

\_\_\_\_\_  
**DECLARATION OF ALEX SPIRO IN SUPPORT OF DEFENDANT SHAWN  
CARTER’S OPPOSITION TO PLAINTIFF’S MOTION TO PROCEED  
ANONYMOUSLY UNDER PSEUDONYM**

I, Alex Spiro hereby declare under the penalty of perjury, pursuant to 28 U.S.C. 1746 as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP. If called as a witness, I could and would testify competently to the information contained herein. I make this Declaration in support of Defendant Shawn Carter’s Opposition to Plaintiff’s Motion to Proceed Anonymously Under Pseudonym.
2. Attached hereto as **Exhibit 1**, is a true and correct copy of Defendant’s Motion to Deny Plaintiff’s Request to Proceed Anonymously (Dkt. No. 38).
3. Attached hereto as **Exhibit 2**, is a true and correct copy of the 7:27 PM EST, NBC News report on an interview that its reporters conducted with the anonymous Plaintiff in this case.

I declare under the penalty of perjury that the foregoing statements are true and correct. Executed in New York, New York on the 23<sup>rd</sup> day of December 2024.

DATED: December 23, 2024

/s/ Alex Spiro

Alex Spiro